

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

**JOINT MOTION REQUESTING AN EXTENSION TO
SUBMIT PROPOSED BUDGET AND AGREEMENT**

COME NOW jointly Plaintiff, United States of America, and Defendants, Commonwealth of Puerto Rico, et al., and respectfully request an extension of time, until July 1, 2013, to submit a final reform agreement together with a proposed budget for implementation of the same. This extension is necessary to complete complex negotiations on comprehensive remedial measures that ensure the sustainable reform of the Puerto Rico Police Department (“PRPD”), address concerns raised by *amici* at the April 11, 2013 hearing, and resolve all claims brought by the United States in the instant action.

On December 27, 2012, this Court granted the Parties’ joint request to stay proceedings “until at least April 15, 2013” to provide the Commonwealth’s incoming administration an opportunity to negotiate and finalize a proposed settlement agreement. Dkt. No. 5. On February 6, 2013, this Court also ordered the Parties to submit a joint proposed budget for implementation of the proposed agreement by March 15, 2013. Dkt. No. 15. Since then, the Parties have been working consistently and collaboratively to finalize both the proposed budget and the agreement itself. Counsel and experts for the Parties met for extended sessions on February 27 and 28, 2013. The Parties then met on March 19 and 20, 2013, and again the week

of April 8, 2013. Since that time, the Parties have continued their work by exchanging draft language and budget proposals and conducting further negotiations over the telephone. The current deadline for the agreement and budget proposal is set for May 31, 2013. Dkt. No. 45. Despite the Parties' good faith efforts to resolve all outstanding issues, the completion of the agreement requires some further negotiations.

The Parties remain committed to sustainable reform of PRPD and to a collaborative resolution of all claims raised by the United States. The Parties have exercised considerable care and diligence to craft an appropriate, long-term remedial plan that builds on PRPD's current reform efforts, strengthens PRPD's crime-fighting initiatives, and increases the public's confidence in PRPD. At present, the Parties have nearly finalized the proposed agreement and budget. To complete these complex negotiations, reach final agreement on all outstanding issues, and prepare for the judicial filing and public release of the agreement, the Parties request an extension, until July 1, 2013.

WHEREFORE, the Parties respectfully request that this Court grant an extension until July 1, 2013, to allow the Parties to complete negotiations and file the final agreement and budget proposal for the Court's approval.

Respectfully submitted, this 28th of May, 2013,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on this 28th day of May 2013, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

s/Luis E. Saucedo

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